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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

THE WILDERNESS SOCIETY

July 21, 1993

Office of the Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

RE: FCC NPRM-PR Docket No. 93-133

TO WHOM IT MAY CONCERN:

Enclosed you will find The Wilderness Society's draft reply comments to the Federal Communications Commission--**FCC NPRM-PR Docket No. 93-133**--the FCC proposal to expand the exemption to the current requirement that large cargo and tanker vessels carry a radio officer.

Sincerely,

Donald J. Hellmann
Vice President
Conservation

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FEDERAL COMMUNICATIONS COMMISSION
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Reply Comments
Of
The Wilderness Society
To The
Federal Communications Commission
On

The Proposed REO Exemption Expansion
FCC NPRM-PR Docket No. 93-133

July 21, 1993

On behalf of The Wilderness Society, I appreciate this opportunity to support the comments submitted by the American Radio Association on FCC NPRM-PR Docket No. 93-133, which proposes to expand the exemption to the current requirement that large cargo and tanker vessels carry a radio officer.

As the Commission is well aware, The Wilderness Society has long been concerned that current FCC requirements may not be sufficient to ensure safety at sea and the protection of our delicate marine ecosystems. In January 1992, The Wilderness Society and ARA jointly filed a petition for rulemaking to update the examination for a Radio Officer license to include knowledge of the operation, repair and maintenance of modern communications and related electronics equipment, including the Global Maritime Distress and Safety System ("GMDSS"). In May 1992, The Wilderness Society supported reconsideration of the Commission's GMDSS Order (PR Docket No. 90-480) to require that compulsory vessels carry on-board maintenance and repair capabilities, such as those of the Radio Officer. We believe then, and we believe now, that the number of vessels that carry potentially environmentally-damaging cargo mandates not a weakening, but a strengthening of the Radio Officer requirement.

That is why we view the FCC's latest proposal as another step backwards. The Commission's proposed rules would grant U.S. Flag ships an automatic exemption to sail on certain international and nearly all domestic voyages without a Radio Officer and certain standard communications equipment, as long as they remain within 150 nautical miles of land. While any broadening of the exemption could reduce safety, the proposed expansion warrants particular concern. We fear that automatically

Officer--possibly riskier route.¹ Moreover, The Wilderness Society has deep concerns about a policy that encourages ships carrying potentially toxic cargoes to hug the environmentally-sensitive coast for longer periods than necessary.

Regretfully, we have already witnessed many times the disaster an oil spill can wreak on the marine ecosystem. One need only think of the Exxon Valdez to imagine the possible environmental consequences on local land and marine life.

Maritime communications equipment, including GMDSS, are essential tools in ensuring safe sailing and minimizing the effects of disaster should it occur. Like any machinery, however, such equipment is not failsafe. A shipboard Radio Officer, who has maintenance and repair capabilities, serves as an invaluable insurance policy on ocean-going vessels. Should the communications or related electronics equipment fail on just one oil tanker, the Radio Officer could mean the difference between a close call and an environmental disaster.

Therefore, The Wilderness Society urges the FCC not to follow through with its proposal to expand the radio officer exemption. The environmental damage caused